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March 31, 2005

VIA FAX - (601) 352-7757
and REGULAR MAIL
Ms. Betty Mallett
McGlinchey Stafford PLLC
City Centre, Suite 1100
200 South Lamar Street
Jackson, MS 39201

Re: *Olivia Y. et al. v. Barbour et al.*

COPY

Dear Ms. Mallett:

I have yet to receive your promised written response to my March 11, 2005 letter as to Plaintiffs' First Request for Production of Documents. As we discussed last week, and as I noted in my letter of March 25, 2005, you were going to indicate what, if any, additional responsive documents will be produced and Defendants' basis for withholding other responsive documents.

We also anticipate receiving from you by April 14, 2005, the quarterly supplementation of the Named Plaintiff case records pursuant to the Amended Case Management Order. As you will recall, your letter of February 16, 2005, assured us that this production will include those Named Plaintiff case record documents discussed in my letter of February 8, 2005, that were omitted from previous disclosures.

In addition, review of recently produced documents suggests that child-specific case records may also be maintained separately by the Adoption Unit charged with handling the placement statewide of children (like the W. children) whose parental rights have been terminated. *See, e.g.,* DHS 017253 (discussing the responsibilities of the Adoption Unit). Please produce, as required, any child-specific case records on any of the Named Plaintiffs maintained beyond the County files and MACWIS by other DFCS units such as the Adoption Unit.

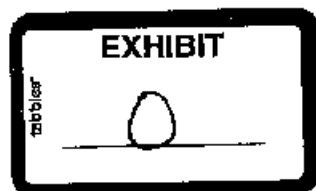
Thank you for your prompt attention to these matters.

Sincerely yours,

Eric Thompson /aw

Eric Thompson
Plaintiffs' counsel

cc: Wayne Drinkwater & Melody McAnally, Bradley Arant
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